

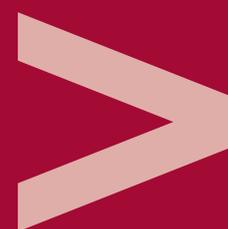
towards an independent general teaching council for scotland

consultation on the future status of the gtcs

analysis of the consultation and scottish government response



DEVELOPMENT



ACCOUNTABILITY

OPPORTUNITY

LEADERSHIP

towards an independent general teaching council for scotland

consultation on the future status of the gtcs

analysis of the consultation and scottish government response

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Ministerial Foreword

The General Teaching Council is a key body in the Scottish educational landscape. Ensuring that the teachers in our schools work to a high standard is vitally important to the development of our children and young people as successful learners, confident individuals, effective contributors and responsible citizens who will go on to make Scotland a more successful country. The move to make the GTCS an independent body is a reflection on how well the Council has contributed to this objective by effectively carrying out its role since it was founded in 1966.



I am grateful to those that responded to the consultation on the future status of the GTCS. The official Scottish Government response to the consultation reflects many of the views expressed by stakeholders in responding to the consultation. I believe the changes that I propose to make to the constitution of the GTCS will develop the body and will help ensure strong and innovative performance over the coming years. In particular I am happy that the Council will retain a teacher majority, while new mechanisms will be introduced to allow members to be drawn from a wider pool of interests.

In the coming months, my officials will continue to work with the GTCS and other key education stakeholders to develop the detail of the proposed changes.

Education in Scotland is currently undergoing a period of transformational change. It is reassuring to me that the GTCS, so long a fixture in Scottish education, will continue to provide a focal point for teaching both as a strong regulator and as a body with a wider interest in driving up levels of professionalism in the years ahead.

I look forward to working closely with the GTCS in the years to come and wish the Council good luck with their transition to full independence.

A handwritten signature in black ink, appearing to be 'KB', with a wavy line underneath.

Keith Brown MSP
Minister for Skills and Lifelong Learning



Executive Summary

Introduction

A Scottish Government consultation “Towards an Independent General Teaching Council for Scotland: Consultation on the Future Status of the GTCS” took place between 2 April 2009 and 26 June 2009. The purpose of the consultation was to allow stakeholders to give the Scottish Government their views as to the role and governance arrangements for the General Teaching Council for Scotland (GTCS) as it moves towards becoming a fully independent, profession-led, regulatory body.¹

Overview of Chapter 2 – Functions of the GTCS

Teaching Standards

- > The majority of consultees (83%) were in favour of the GTCS being given a more explicit responsibility in relation to the teaching standards.

Entry Requirements to Courses of Initial Teacher Education

- > The majority of consultees (79%) were in favour of the GTCS assuming responsibility for setting entry requirements to Courses of Initial Teacher Education.

Approval of Courses of Initial Teacher Education

- > The majority of consultees (80%) were in favour of the GTCS assuming responsibility for the approval of initial teacher education courses.

Continuing Professional Development

- > The majority of consultees (70%) did not think the GTCS should expand its role in relation to CPD often citing concern that the organisation did not have the resources to move into this area of work.
- > Despite the majority against GTCS expansion into CPD, many stakeholders, in their comments on this question could see a role for GTCS.

¹ It should be noted that, although the method allowed for a general “count” of the number of respondents identifying overall support and opposition along with the key issues raised, the analysis of the consultation responses presented in this report is not intended to be a primarily quantitative account. (See paragraph 11 for more detail).

Overview of Chapter 3 – Governance of an independent GTCS

Size of Council

- > Only 52% of consultees responded directly to this question. 86% of those that directly responded considered the most appropriate size of Council was the status quo of 50 members.
- > Many other consultees chose not to directly answer the question (i.e. did not place a figure on the appropriate size of Council) but instead made more general comments such as suggesting that the size of Council should be reduced.

Composition of the Council

- > Many individual respondents felt that the best way to ensure the public interest is well represented is by continuing the current process by which the Scottish Ministers nominate six Council members.
- > The majority of consultees (59%) felt that the current model by which the Council members were identified was the most appropriate. Consultees from all sectors did offer some support for the other options available, most notably 16% being in favour of a variant of models 1 and 2. Model 1 proposed a Council where teachers would continue to be elected while other members would be appointed. Model 2 suggested that all members should be appointed.
- > While the majority of consultees (63%) suggested that there were no groups missing from Council, many other stakeholders suggested a number of additional groupings that they believed should be represented.

Other Relevant Issues

- > The majority of consultees (59%) did not feel that the length of time individuals should be allowed to serve on Council should be capped. 30% of stakeholders felt that a cap should be put in place.



Chapter 1: Introduction and consultation process

1.1 Introduction

1. A Scottish Government consultation "*Towards an Independent General Teaching Council for Scotland: Consultation on the Future Status of the GTCS*" took place between 2 April 2009 and 26 June 2009. The purpose of the consultation was to allow stakeholders to give the Scottish Government their views as to the role and governance arrangements for the General Teaching Council for Scotland (GTCS) as it moves towards becoming a fully independent, profession-led, regulatory body.
2. The consultation made clear that the GTCS, as an independent body, will be given considerable flexibility in the way that it sets its organisational structure and undertakes its work. However, stakeholders were asked a series of questions that would help inform the role of an independent GTCS. Stakeholders were also asked to consider the way in which the GTCS is governed, including questions around the Council's size and its composition.
3. The purpose of chapters 1 to 3 of this report is to bring together in a structured way the key findings from the consultation and to represent the range of opinions expressed by consultees. These chapters focus solely on responses to the consultation. Chapter 4 sets out the Scottish Government response to the consultation and describes the next steps.

Acknowledgements

4. The Scottish Government is grateful for the responses received and for the time taken by stakeholders in considering the issues raised. We wish to thank both GTCS members and officials for their ongoing support for the process of making the Council a fully independent body.

1.2 Consultation Process

5. The consultation ran from 2 April 2009 to 26 June 2009, although late replies were allowed until 8 July. Copies of the consultation were sent to key stakeholders while a larger group were alerted to its publication through an email. In addition the consultation was flagged on various Scottish Government communications and publication was also announced on the Glow network. Local Authority Education Departments were also asked to alert schools to the fact that the consultation had been published. A list of the groups the consultation was sent to is included at Annex A, while a list of those that responded is included at Annex B.

6. It was possible for consultees to respond by completing the response form included in the consultation, either in hard-copy and by posting the response, or by downloading the response form and emailing it to the Scottish Government. Responses were also accepted that did not follow the format of the response form. The GTCS themselves included the consultation on their website and provided space for readers to leave informal comments in relation to the questions being asked. The GTCS also provided an on-line response form which, when completed, was sent directly to the Scottish Government and was treated in the same way as other consultation responses.

Overview of Respondents

7. In total 223 responses were received, (195 were either posted or emailed directly to the Scottish Government while 28 were received through the GTCS online response route). The majority of responses were received from individuals (71%), with the remaining (29%) being made on behalf of organisations. 2 responses, both from organisations, were received too late to include in the data analysis. However these responses did not contain any issues not already raised.
8. All responses that included consent to be published are available in the Scottish Government Library (Saughton House, K Spur, Broomhouse Drive, Edinburgh, EH11 3XD) and on the Scottish Government website at www.scotland.gov.uk/publications.

Table 1: Background to those responding to the consultation

Background	No.	%
Individuals	156	71
Local Authority	21	9
Union/Professional Body	10	5
College Sector	12	5
University Sector	8	4
Other*	14	6

*The other category included religious/faith groups, public bodies and specific interest groups.



Gaps in respondent type

9. Individuals and bodies involved in Scottish Education ranging from colleges and universities through to unions and professional bodies are well represented in terms of consultation responses. There were few responses from wider Scottish civic society, perhaps because the General Teaching Council is seen as being a body solely related to the regulation of the teaching profession.

Campaign

10. 108 responses (49% of the total) received were identical, or very similar. We surmise that they were precipitated by a Teacher Union asking their members to make responses to the consultation. 107 of these responses were from individuals. Each response has been included as an individual response in the analysis i.e. in the general “count” of the number of respondents identifying overall support and opposition. As the main focus of this analysis is on reflecting the range of issues which have emerged without attaching weight to particular viewpoints, the report records the campaign responses alongside the full breadth of views offered by stakeholders.

A note on the interpretation of consultation responses

11. It should be noted that, although the method allowed for a general ‘count’ of the number of respondents identifying overall support and opposition along with the key issues raised, the analysis of the consultation responses presented in this report is not intended to be a primarily quantitative account. It should be noted that:
 - > the point of a consultation such as this is not to be a ‘referendum’ on the different options but to inform and enhance the policy process by providing the opportunity for all interested parties to express their views and their reasons for holding these views
 - > submissions may represent the views of groups of individuals who had got together to submit a joint response and some are from organisations, sometimes representing the views of thousands of individuals. This makes it inappropriate to count the responses in this way (and impossible to count the number of individuals represented)
 - > respondents opted-in to the consultation and therefore are not necessarily representative of their sector. Instead, the main focus of this analysis is on reflecting the range of issues which have emerged without attaching weight to particular viewpoints. Where proportions have been given, these are only intended as a broad indication of the level of support, subject to the limitations listed above.

Chapter 2: Functions of the GTCS

2.1 Introduction

12. This chapter focused on the future role of an independent GTCS. The change in status of the GTCS to a fully independent regulatory body provides a natural opportunity to consider amending the Council's existing statutory functions. Chapter 2 sought views on whether the role of the GTCS could be expanded in relation to three particular strands of work: Teaching Standards; Entry Requirements to, and Approval of, Courses of Initial Teacher Education; and Continuing Professional Development.

Chapter 2: Key Points Summary

- > Consultees demonstrated considerable support for giving the GTCS a more explicit responsibility in relation to the standards.
- > Consultees were also broadly in favour of the GTCS assuming responsibility for entry requirements to, and the approval of initial teacher education courses.
- > However, there were mixed views about whether the GTCS should expand its role into CPD with some consultees expressing concern that it was not appropriate for GTCS to undertake this role as it was not adequately resourced to do so.

2.2 Responsibility for the Teaching Standards

13. There are currently four Standards relating to teachers, the Standards for Initial Teacher Education, Full Registration, Chartered Teacher and Headship that describe the qualities and competencies teachers should have at various stages of their career. Currently the GTCS works with the Scottish Government and others in setting, maintaining and developing the Standards. In effect the GTCS manage the Standards (apart from Headship) with the Scottish Government playing a role in agreeing and helping to set their content. The Standards have no statutory foundation and the consultation aimed to explore whether an independent GTCS should take additional responsibility in relation to them.

Question 1: Would it be appropriate for the GTCS to be given a more explicit responsibility in relation to the standards?



14. **Overview:** Almost all (91.5%) of respondents answered this question. Overall a majority were in favour of the GTCS being given a more explicit responsibility in relation to the standards: 83% agreed while 8.5% disagreed. This overall support was expressed among all sectors responding to the consultation.

Reasons for agreement with the proposal

15. The most common reason given for agreeing with this proposal was that:
- > it is logical and appropriate for the teaching regulator to take a greater responsibility for the Standards, especially as the GTCS already takes a leading role in their management.

“While it is accepted that no single organisation should be able to determine the content and direction of Standards, SLS believes that current practice already reflects a suitable and effective partnership model involving teachers, employers, universities and government (cf: paragraph 26). Consequently, we consider that a more explicit statement of the responsibility of GTCS as guardian, custodian and manager of all Standards (including SQH and any future Standards), set within a partnership model, would now be appropriate.” (School Leaders Scotland)

16. Other reasons given were:

- > it would be helpful in terms of clarity.

“There is no doubt that an explicit statement of the GTCS being the body charged with ensuring those standards are maintained and being the place where breaches of standards are dealt with would give a helpful clarity for all those involved in Education.” (Church of Scotland)

- > maintenance and development of the standards is a core function of the GTCS.

Caveats and concerns with those in agreement

17. There was one main caveat expressed by those in agreement. While a large number of respondents were comfortable with GTCS being given more explicit responsibility in relation to the standards, some were concerned that in carrying out this role, the GTCS should maintain and develop standards in partnership with other key education stakeholders.

“This role should not be pursued in isolation but should be based on a partnership model involving appropriate stakeholders, including teacher unions.” (Educational Institute of Scotland)

*“The School of Education is comfortable with this lead responsibility being recognised more explicitly, provided this is on the basis of the GTCS further strengthening, the partnership model which it currently uses in taking responsibility for the Standards.”
(The University of Aberdeen)*

18. A small number of other consultees stated that although they would support the GTCS taking on additional responsibility in this area, they would like to see more detail as to what the ‘guardianship’ role would entail.

Reasons for disagreement with the proposal

19. There was only one significant reason given by those who disagreed with the proposal:

> the status quo works well and already includes all key stakeholders in developments relating to the standards.

*“The current role whereby the GTCS has had to consult widely and meaningfully with partner bodies such as Initial Teacher Training Institutions has resulted in wide “buy-in” to all standards. This arrangement has worked well and should continue.”
(Argyll and Bute Council)*

> a small number of stakeholders voiced concern over a perceived lack of clarity of what this role would entail.

2.3 Entry Requirements to, and Approval of, Courses of Initial Teacher Education

Question 2

20. Currently, the Scottish Ministers, in consultation with GTCS and Her Majesty’s Inspectorate of Education, decide the entry requirements for admission to teacher education courses in Scotland. GTCS also accredits all Initial Teacher Education courses and the Scottish Government approves them. The consultation sought views on whether the GTCS should assume responsibility for setting entry requirements to, and approval of courses of, Initial Teacher Education.

Question 2: Should the GTCS assume responsibility for setting entry requirements to Courses of Initial Teacher Education?



21. **Overview:** 90% of consultees answered this question with a clear majority of 79% being in favour of GTCS assuming additional responsibility. 11% did not agree with the greatest opposition coming from a minority of respondents in the college sector (where half of colleges who responded did not agree).

Reasons for agreement with the proposal

22. The most common reasons given for supporting the proposal were that:
- > giving the GTCS responsibility for setting entry requirements would be an appropriate step and would help maintain the standard of individuals entering the teaching profession.
 - > GTCS could maintain minimum qualifications regardless of shortages in certain subjects.

“Yes. This is a desirable move which should remove the suspicion that entry standards are relaxed in areas of subject shortage simply to allow quotas to be reached. It should never be the case that an unsuitable applicant gains an ITE place. Better to adhere to a high standard than to compromise on the grounds of expediency.” (Individual response)

Caveats and concerns of those in agreement

23. Those in agreement did not tend to offer many caveats and concerns with regard to GTCS assuming responsibility for setting entry requirements to Courses of Initial Teacher Education. However, concerns and caveats expressed by others included:
- > if given responsibility for setting entry requirements, GTCS must work in partnership with other figures in Scottish Education, and in particular, the Teacher Education Institutions (Universities) offering courses.

“STEC is comfortable that this role is developed further into a co-ordinating lead role, provided again that the GTCS works fully in partnership with the universities in this area. STEC thinks it particularly important that the GTCS should recognise the entitlement of universities to express their own institutional views on student entry requirements in the context of wider discussion with the GTCS and other stakeholders.” (Scottish Teacher Education Committee)

Reasons for disagreement with the proposal

24. There were two main reasons for disagreeing with the proposal:

- > GTCS should have a strong advisory role in setting entry standards, but the final decision should rest with the organisation delivering the course.

“Although GTCS should have a strong advisory role in deciding entry requirements to courses of initial education for public sector school teachers, we would suggest that the Council cannot be given overall responsibility for setting entry requirements without compromising the academic freedom of the Higher Education Institutions delivering these.” (Scotland’s Colleges)

- > a small number of responses suggested that the current system worked well and that the existing collaboration between the Scottish Minister’s, HMIE and GTCS is preferable.

Question 3

25. The consultation also sought views on whether the GTCS should assume responsibility for the approval of initial teacher education courses. Currently, the Scottish Government approves courses accredited by the GTCS, and while in theory could decline to do so, in practice has always approved a GTCS accredited course.

Question 3: Should the GTCS assume responsibility for the approval of initial teacher education courses?

26. **Overview:** The responses to this question were very similar to those given for question 2 with 80% of respondents stating that GTCS should assume responsibility. 10% did not agree with this proposal with a majority of respondents in the college sector the most significant grouping of those not in favour (where half of colleges who responded did not agree). 10% of respondents did not answer this question.

Reasons for agreement with the proposal

- > a large number of respondents thought that GTCS taking on the role of approver was a logical progression, especially as the organisation was already accrediting courses, which the Scottish Government had never failed to approve.

“It should be noted that GTCS, in effect, already has a key responsibility in this area and operates within an existing and effective partnership framework. Consequently, we would argue that a more explicit recognition of current good practice is now needed.” (GTCS)



“The fact that the Scottish Government has always approved courses accredited by the GTCS reflects its confidence in the organisation and would suggest that this additional ‘layer’ is no longer required.” (Fife Council)

- > a small number of other respondents felt that GTCS taking on this role would help to ensure continuity through various stages of an individual’s development as a teacher.

“These courses are being used to prepare people for teaching so it is essential that the body which has responsibility for people once they take up teaching should also assume responsibility here.” (individual response)

Caveats and concerns of those in agreement

27. As with question 2, the majority of those in support of the GTCS assuming responsibility for the approval of initial teacher education courses did not have any particular caveats or concerns. Caveats and concerns expressed included:

- > if given responsibility for approving initial teacher education courses, GTCS must work in partnership with other figures in Scottish Education.

“The work of GTCS in this would be pursued on a partnership model led by GTCS and working with appropriate stakeholders.” (Educational Institute of Scotland)

“Again, of course, we believe it is essential that the GTCS continues with its current partnership approach to accreditation, especially involving the universities fully in GTCS accreditation, e.g. through progressing further development of joint university validation and GTCS accreditation processes.” (The University of Aberdeen)

- > one respondent made the point that if GTCS does assume this responsibility, it will be important to ensure that there are appropriate conflict resolution mechanisms in place to handle cases where a Teacher Education Institution and the GTCS disagree.

Reasons for disagreement with the proposal

28. There were three main reasons given by those that disagreed with GTCS assuming responsibility for the approval of initial teacher education courses.

- > current position works well and there is no need for change.

“The current system works and ensures that there is scope for further discussion between Scottish Government and GTCS should there be concerns over course accreditation. Although this happens rarely, a change to the status quo would

remove the opportunity for professional discussion in relation to the content and structure of initial teacher education courses.” (Dundee City Council)

- > in particular a number of responses from the college sector suggested that GTCS should not be able to approve Teaching Qualification for Further Education (TQFE) courses. These responses preferred the current system through which the Scottish Government is involved in the approval process.

“Scotland’s Colleges welcome the contribution GTCS makes to the periodic review and updating of the TQFEs, but would not wish the GTCS to have powers to approve these, which contravene academic freedom and the autonomy of Colleges. This is a matter for the College Sector, the Teacher Education HEIs and the Scottish Government, just as the teaching qualifications for those lecturing in the Universities are for the Universities.” (Scotland’s Colleges)

2.4 Continuing Professional Development

29. In 2000 the general functions of the GTCS were expanded to include a duty to consider and make recommendations to the Scottish Ministers on the ‘career development’ of teachers. Currently the GTCS accredit all modules and programmes leading to the award of the Standards and could potentially take on more responsibility in relation to CPD. The consultation sought views on whether the GTCS should expand into CPD and if so, what the Council’s role should consist of.

Question 4: Do you think the GTCS should expand its role into CPD? If so, what do you think this role should consist of?

30. **Overview:** Overall 70% of respondents were against the GTCS expanding its role into CPD while 21% were in favour and 9% did not answer. While there was overall opposition, the support from different sub-groups was mixed. Most individuals and local authorities were in opposition however the majority of university, college and union/professional body respondents were in support of expansion. However the views of each sector were by no means unanimous and all contained responses in favour and against GTCS expansion into CPD.



Reasons for agreement with the proposal

31. Those that agree with the GTCS expanding its role into CPD gave a number of examples where they believed this would be appropriate. These included:
- > GTCS could offer a central mechanism for recording teachers' CPD as part of a programme of professional re-accreditation.
- "Given that many parts of a framework for continuing professional development are in place already it is appropriate for the GTCS to be allocated the additional function of creating a coherent framework within which teachers can develop throughout their careers." (Perth and Kinross Council)*
- > Approval or accreditation of CPD specifically designed to help attain and ensure maintenance of standards.
- "As the guardian of the Standards the GTCS should approve programmes and other routes leading to an award of the Standards in order to uphold the consistency of the Standards in the teaching profession." (Learning and Teaching Scotland)*
- > Identification of gaps and weaknesses in CPD provision.
 - > Liaison with key providers to assess potential solutions.

Reasons for disagreement with the proposal

32. There were a number of reasons provided by respondents who did not agree with GTCS expanding its role into CPD. These often overlapped with caveats and concerns offered by those in support of expansion into CPD:
- > CPD was not seen by some as an area the GTCS, as a regulatory body, should be involved in. Some respondents believed that this could lead to a dilution of what is perceived to be the core function of the GTCS, the regulation of the teaching profession.
- "We believe that the key function of the GTCS of guarding the Standards on behalf of the profession and assessing where these have been met, should not be compromised and should remain distinct and separate from the design, development and delivery of programmes to support development towards these Standards." (National CPD Team)*
- > there was widespread concern that the GTCS did not have the resources to take on an additional significant role in relation to CPD, the implication being that to undertake this role, the annual registration fee would have to increase.

- > potential confusion with the role of the local authorities, as the main employers of teachers, in relation to CPD.

“Given the complex and layered nature of CPD delivery that exists at present, monitoring of this by a single national body would be problematic. Local authorities frequently deliver CPD programmes across a variety of employee groups, while they are also best placed to recognise the resource implications of choices made in respect of these programmes, so control and accreditation by a body solely concerned with teaching would be inappropriate.” (COSLA)

- > GTCS should not look to define CPD as this was up to individual teachers. Related to this point a small number of consultees suggested that the consultation implied an overly restrictive view of what CPD could be.

“We think the discussion in the consultation paper round this issue has at its heart a definition of CPD that is narrow and restrictive and is contrary to the way in which the CPD team understands the term. It appears to be based on a course/programme driven model of accreditation, and fails to take account of the current climate of shift of focus towards more collaborative collegiate models of CPD at school/local level, which research and experience indicate as most effective in terms of impact on learning and teaching and school improvement. There is in our view an inherent risk in the proposals that we lose creativity, and limit or restrict the many and varied CPD programmes which are being generated within the profession at local authority, school and personal level to address local development needs.” (National CPD Team)

- > the introduction of CPD would confuse the delivery of CPD in Scotland as there are other bodies already working in this field. Existing work by LTS, the National CPD Team and Local Authorities was cited.

- > GTCS should not engage directly in the provision of CPD.

“...there should be depth and diversity of CPD provision and would not envisage the GTCS becoming a provider of nor the sole arbiter of teachers’ CPD.” (Association of Teachers and Lecturers)



Chapter 3: Governance of an independent GTCS

3.1 Introduction

33. This chapter focused on the governance arrangements for an independent Council. It sought the views on key issues such as how the Council should be formed, how it should operate, who should sit on it and what size it should be. It also sought views on how best to make the Council accountable as an independent, profession-led, public-body while seeking views on the best way to ensure the public interest is fully represented.

Chapter 3: Key Points Summary

- > Overall, consultees did not support a change to the size of the Council.
- > Consultees suggested a variety of methods through which the public interest could be represented on Council. Suggestions ranged from retaining the system of Ministerial appointments to reserving a number of seats to be filled by an independent appointments process.
- > The majority of consultees were in favour of a retention of the current arrangements for deciding Council membership although Model 1, Model 2 and variants of each model all received some support.
- > The majority of consultees did not think that there were other groups who should be represented on Council. However those that were in favour of introducing new groups suggested a wide range of organisations and interests.
- > There were mixed views about whether the length of time an individual can serve on Council should be capped.

3.2 Size of Council

34. The current Council has 50 members, 26 of which are elected, 18 are appointed and 6 are nominated by the Scottish Ministers. The size of Council and its composition is set by the 1965 Act, as amended. The Council of 50 was originally put in place so that as many bodies as possible with a significant interest in teaching in Scotland could be represented. While the Council of 50 has served teaching in Scotland well, the move to independence gives an opportunity to review whether the current size should be maintained. The consultation sought stakeholders views on the most appropriate size for an independent Council.

Question 5: What do you think is the most appropriate size for an independent Council?

35. **Overview:** Only 52% of all respondents directly answered this question. Of those who responded, the vast majority (86%) thought that the most appropriate size for Council was the status quo (50 members). Status quo was therefore supported by 45% of all respondents. The remaining 14% of responses suggested a reduction in Council size (suggestions for Council size ranged from 11 to between 40 and 50).
36. While only half of respondents directly answered this question (in terms of offering a specific figure on the most appropriate size of Council) many other respondents (63%) commented more generally about whether the size of Council should be altered. Taking into account both the direct responses and the more general comments, 45% of all respondents favoured the retention of the status quo and 18% favoured a reduction. 27% of all respondents made a range of other comments, including the need to retain a teacher majority.

Reasons for support of the status quo

37. The most common reasons for supporting the status quo were as follows:
- > the Council is currently having difficulty managing its workload and reducing the size of Council would make this situation even more difficult to handle, especially in light of potential increases in responsibility as signalled in the consultation paper.
“A smaller Council might well struggle to carry out all its functions as well as take on new ones.” (individual response)
 - > the Council of 50 allows for representation from the key bodies in Scottish education. It also allows for a good level of representation of the various types of teachers working in Scotland.
“A substantially reduced Council size would impinge on the democratic principle and a genuine accountability to the various constituent bodies, not least to the teaching profession. A Council which functions merely as an executive body or a board would run contrary to the democratic principle which the EIS believes to be central.” (Educational Institute for Scotland)
 - > The Council works well as it is and a case has not been made for reducing its size.



Reasons for support for a reduction in size

38. The most common reasons for supporting a reduction in size were as follows:

- > a smaller Council would act as a more dynamic forum for debate and would also be more rewarding for members.

"...being a member of the Council has to be a rewarding experience which is difficult to achieve with the current 50 members." (SCIS)

- > co-option could be used to ensure the Council could continue to carry out its workload despite the reduction in size.

"It is accepted that this will mean that the Council will need to move to use a system of co-option where places on a number of committees would be taken up by non-Council members. There is no reason why this should not work well, and indeed may provide an opportunity for the involvement of greater numbers of lay members." (East Renfrewshire Council)

- > a reduction in size would improve the strategic oversight of the GTCS bringing the Council into line with similar regulatory bodies.

- > *"In terms of the structure of the Council, we recognise that its current size can be viewed as a weakness; indeed, a Council of 50 perhaps is too cumbersome and is not conducive to effective strategic decision making. The prospect of a smaller, more dynamic council is therefore an attractive one." (COSLA)*

Retention of a teacher majority

39. A small proportion of respondents made more general comments which did not specifically suggest an appropriate size for Council. While paragraph 39 of the consultation made it clear that the professional majority in Council would not be removed, a number of consultees, in their response to question 5, suggested that the position should be changed and that there should be parity between professional and non-professional members on the Council. The main reasons for this view were that:

- > parity between professional and non-professional members could lead to greater partnership working.

"...there is no reason why elected teachers and other members shouldn't be of the same number, and this would emphasise partnership and collegiality. To insist on a majority of teachers hints at decisions by voting rather than consensus." (ADES)

- > parity would strengthen credibility as it would allow the GTCS to demonstrate that it took the interests of the public seriously.

“The Scottish Consumer Council’s good practice guide on effective self-regulation identified that one of the key principles of a credible self-regulatory scheme is independent representation on its governing body. It is Consumer Focus Scotland’s position that 50 per cent of the members of the GTCS should be non-teachers.”
(Consumer Focus Scotland)

40. However, a majority of respondents emphasised the importance of the retention of a teacher majority to maintain the GTCS’ credibility amongst the teaching profession. It was also suggested by many that as teachers fund the GTCS through the annual subscription, then it is correct that they hold the majority on Council.

“To ensure the credibility of the Council to the teaching profession, the retention of an elected majority of professional teachers is essential.” (School Leaders Scotland)

3.3 Composition of the Council

41. The consultation sought views on the composition of an independent GTCS. If the size of the Council changed then it is likely that the number of representatives of each sector would be required to change and it is also possible that categories could be removed and new ones created. Even if the size of Council was not to change, then the consultation suggested that the move to independent status provided an opportunity to consider the Council’s composition.

Question 6

42. The public interest is currently represented on Council by six members nominated by the Scottish Ministers. The members must cover the interests of parents and pupils, commerce or industry and children or young persons with additional support needs. As under an independent Council the Scottish Ministers will no longer nominate members, the consultation asked for ways in which the public interest could be adequately represented on Council. In particular the consultation highlighted that the Scottish Government believed the number of lay members on Council was low.

Question 6: How best can we ensure that the public interest is well represented on an independent Council?



43. **Overview:** The majority of respondents (88%) answered the question. Around half (49%) suggested that the best way to ensure that the public interest is well represented on Council is for the Scottish Ministers to continue to appoint a proportion of members for this purpose. The vast majority of respondents with this view were individuals. 39% of respondents suggested other ways in which the public interest could be represented.

Scottish Ministerial Appointments

44. Those in favour of continuing the process of Scottish Ministerial appointments rarely gave reasons for this view, but those that did suggested that it was the responsibility of the Scottish Ministers to undertake this role.

“The Government must continue to appoint members intended to represent the public interest. This is a clear responsibility of any government. The Government cannot abrogate its responsibility in the area; nor can it delegate this responsibility to the GTCS itself. The current number of six is totally appropriate. The SSTA rejects any attempt to ‘represent the public interest’ other than by direct nomination by the Ministers.” (Scottish Secondary Teachers Association)

Other methods of ensuring that the public interest is well represented on Council

45. It was argued that the public interest would be well represented by:
- > adopting an independent appointments process through which members of the public can apply.
 - > adopting the definition of lay member proposed in paragraph 63 of the consultation. While few respondents commented directly on the definition of lay member, it was felt by some that adopting this definition would encourage wider stakeholder engagement than the current arrangements where it is possible for registered teachers to apply and be appointed as representatives of the public interest. It should be noted that this view was not universally held and some respondents felt that the definition of lay member suggested in the consultation paper was overly restrictive as it would not allow a teacher, who is also a member of the public with other interests, e.g. as a parent, to become a Council member through this route.

“Lay members who are not registered teachers should be encouraged. It is not only teachers who wish to “ensure that we ensure children receive a high standard of teaching.” (Scottish Engineering)

- > the public interest would be well served by ensuring that key bodies are guaranteed seats on the Council. For example many local authorities argued that guaranteeing seats for key bodies such as ADES and COSLA was a way in which the public interest would be well served. Similarly, both the Roman Catholic Church and the Church of Scotland argued that a continuation of their guaranteed seat on Council would ensure an element of the wider public interest was represented.

“The public interest is served not only by having impartial and respected appointees, but also by ensuring that the employing bodies, the education authorities, are well represented.” (Association of Directors of Education Scotland)

Question 7

46. The consultation sought views on two potential models for an independent Council. Model 1 proposed the retention of an election process for teacher members while removing guaranteed seats for organisations replacing them with an independent, skills based, appointments process. Model 2 proposed that both teachers and non-teacher members would be appointed. The categories from which teachers are elected would be retained but as in Model 1, there would be no guaranteed seats for organisations. The consultation also suggested a variant of Model 1 by which guaranteed seats for key organisations could be retained.

Question 7: In terms of models the independent Council could adopt, do you prefer Model 1 or Model 2, a variant of either model, the status quo, or something completely different?

47. **Overview:** The majority of respondents (59%) suggested that an independent Council would be best served by retaining the current model. While 83% of individuals supported the retention of the status quo a number of organisations favoured either Model 1, Model 2 or a variant. 16% of respondents supported a variant approach. Support for Models 1, 2 and variant approach was high amongst responses from organisations with local authorities, unions/professional bodies and universities showing strong support for the development of a variant. There was almost no support for a completely different approach.



48. Many responses to this question overlapped with responses given for other questions that also relate to the composition of an independent Council. For example, the models for Council considered in question 7 suggest an independent appointments process for all, or elements of the membership, including public interest members. Where respondents support an independent appointments process for public interest members in question 7, they naturally support an independent appointments process as a means of ensuring the public interest is well represented, as per question 6.

Reasons for agreeing to the continuation of the status quo

49. Those in favour of the retention of the status quo gave five reasons for this view:

> there is no evidence to suggest that the current system does not work.

“The status quo option is the only option which can be guaranteed to rigorously set the standards and maintain the functions of the Council. With so many aspects of Scottish education in crisis it is wholly inappropriate to attempt to change those which work well.” (Scottish Secondary Teachers Association)

> teachers trust the GTCS in its current form. A change to the status quo would risk a loss of confidence in the GTCS.

> the GTCS in its current form has been used as a model for the development of other Teaching Councils both within the UK and abroad.

> other models could leave teachers underrepresented in Council.

> the current model ensures proper representation of teachers and relevant other bodies.

Reasons for agreeing with Model 1

50. The small number of those who agreed with Model 1 gave the following as reasons:

> Model 1 retains the teacher election process. This was seen as being key to a very large number of respondents.

“We also think it would be useful to keep elections for sector representation in order to ensure that the link between financial support and democratic representation is maintained.” (Glasgow University)

> A clear appointments process for all non-teaching posts would make the appointment of all Council members more transparent.

Reasons for agreeing with Model 2

51. The small number of those who agreed with Model 2 were in favour of it for the following reasons:
- > Model 2 was perceived as being open and transparent and would enable the views of a wide number of stakeholders to be heard.
 - > it would give GTCS independence from Government, but also independence from other parts of Scottish Education that currently have an influence over the composition of Council.
 - > it provides public assurance as all members would be appointed independently rather than elected by teachers.
 - > Model 2 would strengthen the Council and improve its strategic capabilities.

“Aberdeenshire Council while recognising the strengths of the current Council model believe that the setting up of an Independent Council provides the opportunity to create an alternative model which would more closely meet the needs of our teachers and children both now and in the future whilst maintaining public confidence. We would therefore favour a model which was based on the appointment of all Council Members.” (Aberdeenshire Council)

Caveats and concerns relating to Model 2

- > Some respondents in favour of Model 2 suggested that to take the option forward, it would be necessary to consider and discuss the implications in more detail.

“Any such appointment procedure would require careful consideration and further consultation to ensure that the composition and balance of the Council maintained adequate representation from the teaching profession, local authorities, universities, parent bodies and those organisations with legitimate interest in teaching and education in Scotland.” (Aberdeenshire Council)

Reasons for suggesting a Variant of either Model

Variant of Model 1

52. The majority of respondents in favour of a variant suggested a model for Council, based upon Model 1, that would contain elected teachers, guaranteed, self-selecting seats for key groups and a number of seats that would be left open for public interest representatives. The open seats would be filled on application either by members of



the public or by representatives of organisations working in a particular area of the public interest, for example, a member of a parents body or a member of another regulatory body. The concept of open seats for public interest representatives is discussed further in the analysis of question 8.

53. Respondents made the following points in support of this variant:

- > It would allow for the retention of key bodies that either are critical to the delivery of education in Scotland (e.g. employers) or have a strong history of effective work within the GTCS (e.g. churches). While all of the organisations with guaranteed seats on Council received support in terms of their continued presence on Council, teachers employers, (ADES/COSLA) and Universities offering Initial Teacher Education courses and employers of teachers in the college sector were particularly well supported.

“The introduction of a more open and accountable appointments process is appropriate and we have suggested ways in which this might operate.... In endorsing this in principle, GTCS would indicate that there may be some categories of membership (notably local authority and FE employers and initial teacher education representatives) who should be represented on GTCS as of right.” (GTCS)

“It would be regrettable if organisations with a significant interest in education, whose nominees already play an important part in the work of GTCS, were no longer guaranteed seats on Council.” (Scottish Catholic Education Service)

- > This variant retains the elected teacher majority which is perceived to be important in terms of maintaining teachers’ confidence in the GTCS. It also strikes a balance between the need to retain the election of teachers and key education bodies, while increasing the role of non secular interests.

Variants of Model 2

54. A small number of organisations suggested a variant of Model 2 would be appropriate. These organisations either suggested appointment of all members in combination with parity between teacher and non-teacher members, or independent appointment of all members apart from a very small number of guaranteed seats for what were perceived to be key players.

Concern in relation to the variant models

55. While in support of an open appointments process for public interest representatives, a small number of respondents cautioned against developing overly strict criteria for the recruitment of these members, thereby inadvertently decreasing the diversity of Council members.

“Setting formal skills criteria for elected teachers might eliminate from the process the independent thinkers who could add significantly to the quality of debate – the new GTCS should not be a homogeneous body, but should represent all quarters of opinion.” (City of Edinburgh Council)

Question 8

56. A number of organisations are currently guaranteed seats on Council. Teachers’ employers, Further Education Colleges, the Scottish Council of Independent Schools, Universities, Church of Scotland, Roman Catholic Church and the Association of Directors of Social Work appoint their own representatives while the Scottish Ministers appoint individuals to ensure certain elements of the public interest are represented. The consultation recognised that the breadth of representation from key education interests has been valuable, however the consultation sought views on whether there were any groups missing from the Council from which it would benefit.

Question 8: In considering the composition of the current Council, do you think that there are groups missing from whose input the Council would benefit?

57. **Overview:** 63% of respondents did not believe that there were groups missing from which the Council would benefit while 24% believed there were. The majority of individuals that responded did not believe there were groups missing, while the majority of organisations that responded believed there were. The table below sets out the range of groups/organisations that respondents thought should be involved.



Table showing the groups that respondents thought should be represented on Council

Groups/Organisations	Number of times suggested by respondents
Parents	16
Children/young people/pupils	15
Scottish Qualifications Authority	12
Learning Teaching Scotland	12
Integrated services/GIRFEC (Getting it Right for Every Child)	12
Business	12
Children's Commissioner	6
Sports Groups	6
Arts	6
Police	4
Youth workers	3
HMIE	3
Learning support practioners	2
Community Education Tutors	2
Scotland's Colleges	2
Health boards	2
Disabled people	1
Children's organisations	1
Equality Groups	1
Race, Gender and Sexuality groups	1
Scottish Government	1
Other professional bodies	1
International member	1
University member as educator	1
Management experts	1
Psychotherapeutic experts	1
Students	1
Teachers at different points of their career	1
Chartered Teachers	1
Atheists	1
Agnostic	1
National CPD Team	1
Local authority induction managers	1
Careers staff	1
Scottish Interfaith Council	1
Association of Chartered Teacher	1
Trade Unions	1
Youth organisations	1

Reasons for inclusion of additional groups

58. Respondents sometimes gave views as to why certain groups should be represented on Council. Reasons for inclusion of the most frequently named organisations/groups are listed below:

- > LTS/SQA – seen by some as being very significant organisations within Scottish education and should therefore be represented.
- > Integrated services/GIRFEC – as there are other services involved in the well-being and development of children, it would be beneficial if the Council had direct involvement with them.

“Teaching is, at its core, a team of professionals working for every child in Scotland. If we are to Get It Right For Every Child, we need to see this reflected at the very heart of teaching. It is not a fluffy peripheral. In ITE, students should see that we are professionals working together right for the beginning.” (Individual response)

- > Children/young people/pupils – as children are direct consumers of teaching some felt that it is appropriate for GTCS to engage directly with them.

“The involvement of children and young people themselves is paramount. Organisations such as the GTCS should establish effective means of achieving this, and indeed many similar bodies, such as the General Medical Council and the SSSC, have done so. It is important that mechanisms exist which encourage children and young people in general to participate in informing the direction of bodies which play such a crucial role in their lives.” (Children in Scotland)

- > Parents – as with children, parents are seen as being key stakeholders for the education system, including the regulation and development of the teaching profession.
- > Business – while 12 respondents suggested business interests should be represented, none gave reasons for this choice.

Caveats and concerns of those in agreement

59. Caveats and concerns with those in agreement included:

- > some respondents argued that if a process was adopted by which appointment was made on the basis of the strengths of applicant and the needs of Council, then there would be no need to set aside space for particular strands of public interest.



“It may be useful to identify the core organisations and secure their representation, and to make available a number of places for which other stakeholder organisations and, indeed, members of the public could apply.” (East Renfrewshire Council)

- > it is not necessary for all the various groups to be represented. GTCS, could develop mechanisms for engagement with, for example, pupils and other actors in the wider childcare arena, as opposed to these groups actually being formally represented on Council.

Reasons for disagreement with the proposal

60. There were two main reasons for disagreeing with the proposal:
 - > the current make up of the Council is adequate for its purpose and the public is well represented by the system of Ministerial appointments.
 - > it is an advantage to the Council if its members have a good knowledge of Scottish Education. Diluting this core base of knowledge would not be in the interest of Council.

3.4 Other relevant issues

61. This section of the consultation explained that it was the Scottish Minister’s intention that:
 - > an independent GTCS would continue to submit its Annual Report, Strategic Plan and Diversity Action Plan to the Scottish Parliament;
 - > an independent GTCS should have full control over its own finances; and
 - > an independent GTCS should be able to develop its own rules in relation to the removal of Council members.

Question 9: Do you have any comments relating to the issues raised in this section?

62. **Overview:** 64% of respondents commented on the issues raised in paragraphs 65 to 68 of the consultation. A large number of individual responses (102) expressed a view that that the GTCS should continue to submit an annual report to the Scottish Parliament while a number of responses (7%) were broadly supportive of the proposals.

3.5 Terms of Office

63. Currently Council members are elected or appointed for terms of four years. Further to completing the four year term, they are then free to stand again for election, or to be re-appointed. For elected and appointed members, there are currently no restrictions on the number of terms that an individual can stand as a member of Council. Ministerial nominees are bound by the Office of the Commissioner for Public Appointments (OCPAS) Code of Practice and under normal circumstances can only serve two terms but could re-apply for a third term through open competition.
64. The consultation sought views on whether there should be a cap on the number of terms the individuals should be allowed to serve on the Council.

Question 10: Do you believe the length of time individuals should be allowed to serve on Council should be capped?

65. **Overview:** Overall 59% of respondents were not in favour of placing a cap on the number of terms individuals should be allowed to serve on Council. 30% were in favour of a cap with 11% not answering the question. The majority of individuals that responded to the consultation (79%) did not believe there should be a cap while the majority of organisations that responded believed there should be with Universities and local authorities showing particularly strong support for the proposal.
66. Amongst those that supported the introduction of a cap 65% agreed with the model of only being allowed to serve two terms. As a small number of others thought that the OCPAS appointments guidance should be used as the basis, these have been included in this figure. Others suggested alternative timeframes for capping membership.

Reasons for agreement with the proposal

67. The most common reasons given for supporting the proposal were:
- > a requirement to serve no more than two terms within a set number of years would strike a balance between ensuring continuity in membership while allowing for a suitable level of turnover.



- > a small number of those that agreed with the proposal to cap length of membership also made the point that the introduction of a cap on membership should take place in combination with the introduction of a system by which there would be a staggered turnover of members.

“The ideal arrangement would be to establish a rolling programme of appointments so that there is never an entirely new Council (e.g. 50% appointed/reappointed every 2.5 years)” (Association of Heads and Deputies Scotland)

- > there is no good reason for diverging from existing recommended practice (either in the form of OCPAS guidance or the practice adopted by other regulatory bodies).

“...the GTCS should also be bound by the convention that members do not serve more than two terms except under exceptional circumstances...” (Scotland’s Colleges)

Reasons for disagreement with the proposal

68. There were two main reasons given by those that disagreed with the proposal.
- > capping the number of terms an elected member can serve is undemocratic. Some respondents question why it would be appropriate to cap the number of terms individuals can serve on the GTCS when MPs and MSPs, also elected into their positions, are unrestricted in the number of terms they can serve. 17% of respondents who disagreed with the proposal suggested that while elected members should be unrestricted in the number of terms they can serve, the number of terms appointed members are allowed should be capped.
 - > introduction of a cap would lead to Council losing experienced members who are working well and are keen to continue to serve.

“I believe if someone is doing an excellent job they should be able to continue this and it is an injustice if you make a cap on elected member as they have been elected. Time should not be restricted.” (Individual response)

69. Other reasons given include:
- > as it is difficult to find suitable Council members now, populating Council would be even more difficult if caps were introduced.
 - > the independent Council should resolve this issue as opposed to it being subject to a Government decision.

3.6 Additional Comments

70. Consultees were invited to add any additional comments they saw fit and this resulted in a wide variety of points being made. Consultees also made some general points in question 9 that did not relate directly to section 3.4. These have been included in this part of the analysis.

Registration of other groups

71. A small number of responses indicated that they believed that the consultation would have been an appropriate juncture to consider whether the registration function of the GTCS should be expanded to cover other groups working with children in the education sector. Suggestions included:

- > a requirement for college lecturers to be registered.
- > an expectation that those teachers working in the independent sector should be registered.
- > registration of music instructors.
- > registration of classroom assistants.
- > registration of others caring for children in a school setting – e.g. after school clubs.

Management Board/Payment of Council Members

72. A large number of individuals who had completed the response form along the lines of the trade union campaign described in paragraph 10, almost always made two additional comments:

- > the concept that a 'Management Board' will be able to undertake the current functions of the GTC is totally untenable as it would concentrate far too much power in too few hands.
- > members of the GTC must not be paid. Such an arrangement, especially in current circumstances, would lead to doubts as to the GTC's credibility and impartiality. It would also increase costs.



Other additional comments

- > Key functions of GTCS should not be altered and the central responsibility of the Council should continue to be the strong regulation of the profession.

"...the GTCS is an effective and well-respected regulatory body for the teaching profession in Scotland. As such, we would suggest that radical changes to its functions are not required at this stage." (COSLA)

- > The independent Council should be able to change its own rules.

"We believe that the new independent Council should be given the general power to make changes to its rules and procedures, without the need to seek prior legislative authority from the Scottish Government on specific changes. Of course, this would be on the basis that the Council exercises such power through the use of a full partnership model with other key stakeholders, including the universities involved in teacher education." (The University of Edinburgh)

- > Organisations should be recompensed for the release of their staff to undertake work with the Council.

- > The role of the GTCS should not be extended into colleges.

"Scotland's Colleges would not support any extension of the role of the GTCS with respect to Colleges and their staff, because Colleges do not believe this would add value to the processes already in place and would limit the life-changing opportunities offered to learners of all ages in College. The view of lecturers in supporting this is confirmed by the majority who are not registered with the GTCS." (Scotland's Colleges)

Chapter 4: Scottish Government response

4.1 Summary of Proposed Actions

73. Having fully considered the analysis of the consultation this section summarises the actions that the Scottish Government proposes to take as part of the GTCS' move to becoming an independent body. Many of these proposals will be reflected in secondary legislation laid before the Scottish Parliament, subject to the Public Service Reform Bill receiving Royal Assent.
74. As stated in the consultation paper, the Scottish Government does not believe the move to independent status should result in significant change to the core functions of the Council. The over-arching responsibility to ensure through strong regulation, that the teaching profession is well placed to provide the best possible standard of education for Scotland's children, will remain central to all the activities the GTCS is involved in. While the core functions of the Council will remain the same in an era of independence as they are now, the Scottish Government does wish to propose some areas where the role of the GTCS should be expanded.
75. As explained in paragraph 24 of the consultation, it remains the intention of the Scottish Government to re-examine the way in which the functions of the GTCS are drafted so that the Council and Scottish Government can more easily reflect topical issues and changing priorities in relation to education policy. Powers in the draft Public Service Reform Bill will therefore be used to set the functions of the GTCS within relatively broad parameters allowing the organisation to more easily adapt its role in consultation with key stakeholders, including the Scottish Government, without having to rely on legislative change.
76. The full rationale behind the decisions and more detailed information about how both the policy and secondary legislation will be taken forward is set out later in this chapter.

Part 1 – Functions

GTCS responsibility in relation to the Standards

- > The GTCS will be given responsibility to lead, in partnership with key players in Scottish education, on the development and maintenance of all current and future Scottish Teaching Standards.



GTCS responsibility for setting entry requirements to Courses of Initial Teacher Education

- > The GTCS will be given responsibility for setting minimum entry requirements to Courses of Initial Teacher Education relating to teaching in schools. It will be a requirement for this to be done in partnership with key Scottish Education stakeholders including course providers, employers, teacher unions and the Scottish Government.

GTCS responsibility for the approval of initial teacher education courses

- > The GTCS will be given responsibility for the approval of Initial Teacher Education courses relating to teaching in schools. It will be a requirement for this to be done in partnership with key Scottish Education stakeholders including course providers, employers, teacher unions and the Scottish Government.

GTCS expansion into CPD

- > The GTCS will be invited to develop and consult on proposals for a system of re-accreditation for teachers which will build on and develop best practice in professional review and development, while ensuring that teachers continue to maintain high standards throughout their careers.

Part 2 – Governance

Size of Council/Ensuring Public Interest/Model of Council/Additional Groups

- > The size of the Council will be reduced to 37 members. The Council will be composed of 19 elected teachers, 11 members appointed by key organisations and 7 lay members representing the public interest.
- > The new Council will contain a higher percentage of public interest representatives than the current Council. A definition of lay member similar to the one in paragraph 63 of the consultation will be applied to public interest members.
- > The Council will develop an appointments process through which public interest members will be recruited to Council. Criteria will be set so that the process guarantees a wide and balanced spread of public interest representatives.

Other issues

Number of terms individuals should be allowed to serve

- > All Council members will be allowed to serve two terms of four years within a period of twenty years.

4.2 Proposed Actions

Chapter 2

Question 1: Would it be appropriate for the GTCS to be given a more explicit responsibility in relation to the standards?

77. The majority of respondents to this question supported the GTCS being given a more explicit responsibility in relation to the Standards. The Scottish Government agrees that it would be appropriate for the GTCS to be given a lead role in relation to all the Teaching Standards and accordingly plans to amend the Teaching Council (Scotland) Act 1965 so that it reflects this.
78. It is recognised that one of the strengths of the current system is that the Scottish Government ensures that the Standards are developed in partnership with key players in Scottish Education. However, in formalising the GTCS role in this area, the Scottish Government intends that the forthcoming legislation underpinning this function will require the GTCS to consult fully when developing, introducing and amending the Standards. It will be necessary for the GTCS to work in partnership with stakeholders including course providers, employers, teacher unions and the Scottish Government. This will guarantee that the collegiate environment in which work on the Standards is carried out will continue under the watch of the GTCS.

Question 2: Should the GTCS assume responsibility for setting entry requirements to Courses of Initial Teacher education?

79. The majority of respondents to this question supported the GTCS assuming responsibility for setting entry requirements to Courses of Initial Teacher Education. The Scottish Government agrees that it would be appropriate for the GTCS to assume this responsibility in respect of ITE courses relating to teaching in schools and accordingly plans to amend the Teaching Council (Scotland) Act 1965 to reflect this.
80. If the GTCS is given a more specific role as lead body for the development and maintenance of the Teaching Standards, it would be a logical development for the Council to also be the body that sets minimum entry requirements. This will mean that GTCS would have full responsibility for setting the standards to which teachers in state schools in Scotland should be working. Local Authorities, as teachers'



employers, will continue to be responsible for ensuring staff meet the expected standard and effectively undertake their work.

81. Clearly, in carrying out this role the GTCS will be required to work closely with key stakeholders, in particular the institutions offering ITE courses, but also employers, teacher unions and the Scottish Government. As with the Teaching Standards, the Scottish Government intends that the forthcoming legislation underpinning this function will require the GTCS to consult fully when making changes to entry requirements. It will also be a requirement for the GTCS to actively consider issues raised by the Teacher Education Institutions as they arise. The Scottish Government, in conjunction with the GTCS, will consider how best to facilitate this exchange. As under current arrangements, institutions offering courses will be able to offer places to students on the basis of their own criteria, as long as the minimum entry requirements are met.
82. The majority of college sector respondents to this question stated that they did not believe that GTCS should assume responsibility for setting entry requirements for Teaching Qualification (Further Education) (TQFE) courses. The college sector is diverse and it has been suggested that current guidance on entry requirements adequately meets the specific needs of Scotland's colleges. It could also be argued that the number of college lecturers registered with the GTCS is not currently sufficient to grant GTCS a mandate to undertake this role.
83. Consequently, the Scottish Government does not believe it is appropriate, at this stage, for the GTCS to be given responsibility for setting minimum entry requirements in relation to TQFE. Therefore the current arrangements for setting normal entry requirements to TQFE courses will continue. GTCS will however remain part of the partnership involved in planning these arrangements.
84. More broadly, however, the Scottish Government would like to highlight that cross-sectoral GTCS registration helps to ensure that standards across all sectors remain high while promoting professional collaboration and understanding. With this in mind, the Scottish Government encourages the GTCS and the college sector to continue to develop their relationship and increase the level of registration amongst college lecturers. A strengthening of this relationship and an increase in the level of registration would add weight to the case made by some for the GTCS to have an enhanced role in respect of ITE for the college sector.

Question 3: Should the GTCS assume responsibility for the approval of initial teacher education courses?

85. The majority of respondents to this question supported the GTCS assuming responsibility for the approval of Courses of Initial Teacher Education. The Scottish Government agrees that it would be appropriate for the GTCS to assume this responsibility in respect of courses related to teaching in schools and accordingly plans to amend the Teachers (Education, Training and Recommendation for Registration) (Scotland) Regulations 1993 so this arrangement is reflected.
86. The Council already accredits primary and secondary ITE courses and the Scottish Government has always approved on the basis of GTCS recommendations. As the current SG process is little more than a ‘rubber-stamping’ of Council work, it is logical that an independent Council focussed on the development and maintenance of teacher’s skills, should accredit and approve courses that lead to the attainment of the Standards for Initial Teacher Education.
87. The Scottish Government does not however believe it is appropriate for the GTCS to be given full responsibility for the approval of TQFE courses. Currently, the approval process involves Scottish Government and GTCS working closely together with experts from HMIE and the college sector. As this approach has in the past been welcomed by the college sector and is supported by some of the colleges responses to the consultation, the Scottish Government consider that arrangements for the approval of TQFE should remain largely unchanged.
88. However, the Scottish Government, in line with the rationale outlined in paragraph 84, would like to note that it believes that the GTCS could, through a partnership arrangement, take a key role in this area of work. The advent of Curriculum for Excellence may, in addition, lead to a greater need to ensure better coherence of pedagogical practice across sectors. It is possible that these questions could be revisited as a result of further discussions and agreement between the Scottish Government, GTCS and the college sector.

Question 4: Do you think the GTCS should expand its role into CPD? If so, what do you think this role should consist of?



89. The Scottish Government notes that there was no clear view from the consultation as to whether the GTCS should have a role in relation to CPD, and if so, what that role should be. While many respondents believed that GTCS should not move into this area of work, many felt that this would in fact be appropriate and a variety of possible roles were suggested.
90. Taking the mixed views into account in conjunction with the complexity of the CPD landscape in Scotland, the Scottish Government is not minded to significantly amend the functions of the GTCS to give the Council an overall lead in this area. The one specific area related to CPD where the GTCS will be asked to take lead responsibility, relates to the re-accreditation of teachers.
91. The GTCS does however have an important role to play in maintaining and developing standards in Scottish Teaching. Accordingly, the Scottish Government expects that the GTCS will play a central role in discussions around the ongoing development of appropriate and effective CPD for Scottish teachers. It is also possible that an independent GTCS may, in partnership with others, require to consider ways in which this role might be further developed in future.
92. Currently the GTCS has responsibility for CPD through the operation of the Framework for Professional Recognition/Registration, aspects of the Flexible Route to Headship Programme and through the accreditation of all modular Chartered Teacher Programmes provided by the universities. These responsibilities will continue in an era of independence.

Re-accreditation

93. The Scottish Government consider it is appropriate to invite the GTCS to develop and consult on proposals for a system of re-accreditation for registered teachers in Scotland. It is expected that this system will build on those aspects of current good practice which can help teachers to keep their skills up to date as their careers develop and school curriculum and learning patterns change. For example, a supportive but rigorous system of professional review and development can assist individual teachers to identify constructive ways to update their professional skills, effectively confirming that teachers have maintained high standards and helping to ensure the future quality of professional teaching skills across Scotland's schools. This in turn will help ensure that pupils receive a consistently high level of teaching throughout their school careers. In developing such a system it is expected that the GTCS will discuss their proposals and consult fully with all interested parties including

the teacher unions, professional bodies, local authorities, universities, colleges and the Scottish Government.

94. The Scottish Government recognises that the introduction of a system of reaccreditation will, in time, require GTCS, in partnership with other stakeholders, to consider how best to promote opportunities to maintain and improve standards of teaching.
95. Although a significant new role for the GTCS, it is our view that the development and subsequent management of a system of re-accreditation fits well with GTCS overarching responsibility to ensure that the teaching profession provides the highest possible quality of education for children in Scotland's schools. An increased focus on the maintenance of standards will help embed a culture of ongoing professional development throughout the profession. The independent GTCS will therefore have a responsibility to set the requirements for entry into the profession, to set the standards that all teachers must work to, while taking on a new responsibility for helping teachers ensure their skills remain up to date.
96. In amending the Teaching Council (Scotland) Act 1965 we will ensure that the GTCS have the necessary statutory basis for the introduction of a re-accreditation scheme.

Chapter 3

Question 5: What do you think is the most appropriate size for an independent Council?

97. The Scottish Government acknowledges that a large number of respondents to the consultation suggested that the status quo, a Council of 50 members, should be maintained. However, the Scottish Government is not convinced that the retention of a large Council, would be the best way forward for an independent GTCS. Accordingly we propose the Council is reduced to 37. The Scottish Government believes that a Council of 37 is large enough for a wide range of teachers and key education interests to be involved while allowing for a more concentrated strategic focus. A smaller Council will also encourage more dynamic interaction between Council members, especially in the forum of full Council meetings.
98. The consultation paper, in paragraph 39, stated that “the Scottish Ministers are minded to retain the professional majority in Council as a key component of a credible self-regulating, profession-led body.” Many respondents made clear that they



wished to see the retention of the teacher majority in an independent Council. By way of confirmation, the teacher majority will be retained in the smaller Council with 19 members of Council being elected teachers.

99. As the current Council of 50 members is currently facing difficulties in completing all necessary committee work, it is likely to be necessary for a smaller Council to operate a system of co-option by which GTCS can bring in non-Council members to help take committee work forward. It is the intention of the Scottish Government that the legislation supporting the GTCS will give the organisation considerable flexibility to develop and operate a system of co-option as it sees fit. The Council itself will therefore be required to consider issues such as how to recruit co-opted members and to what committees they will serve.

Question 6: How best can we ensure that the public interest is well represented on an independent Council?

100. The Scottish Government agrees with the respondents that suggested the public interest can be best represented on Council through the introduction of an independent appointments process through which members of the public can apply to become Council members. The Scottish Government proposes that in a Council of 37 members, it would be appropriate for 7 seats to be set aside for lay members who could apply through an open public appointments process. This represents a significant increase in the number of public interest members as in the current Council there are 50 members with only 6 representing elements of the public interest.
101. Some respondents to the consultation suggested that the Scottish Ministers should continue to directly appoint public interest representatives to the Council. As an independent body it is not appropriate for the Scottish Ministers to influence the composition of the Council. As suggested in the consultation, continuation of the system of Ministerial nominations will end after the Twelfth Council.

Independent Appointments Process

102. A framework will be developed through which members of the public can apply to be a member of Council. It will be important that key interests such as parents, business and individuals with experience of wider children's services are included in Council. It is expected that the appointments process will encourage the inclusion of key

interests and will require those running the process to consider the overall balance of interest within Council. The process will be flexible so that potential gaps in the skill base of the overall Council could be filled through a public appointment.

103. It will also be important that the essential criteria for council members recruited from the general public is not restrictive and allows capable members of the public, from a wide variety of backgrounds, to apply to become Council members. The legislative basis for the independent appointments process will be set out in the forthcoming amendments to the 1965 Act. It is expected that the GTCS will develop the detail of the proposed independent appointments process, drawing on best practice, before consulting with stakeholders.

Lay Membership

104. The Scottish Government believes that the seats set aside to allow the public interest to be represented should be subject to a strict definition of 'lay member'. At present it would be possible for a registered teacher to be nominated by the Scottish Ministers to Council as a public interest representative. We believe that for the GTCS to retain the confidence not only of the teaching profession but of the public more widely, the percentage of seats for public interest members should be increased and a strict definition of lay member applied to these seats. This will guarantee that Council always contains a wide range of independent members complementing the larger group of education professionals. A definition of lay member similar to that set out in paragraph 63 of the consultation will be adopted for this group of Council members.
105. The Scottish Government accepts that it would not be appropriate to extend this definition to the members who will be appointed by key organisations. As many of these organisations have an educational focus and have members who are, or have been teachers, it would be counter-productive, if not impossible, to force them to only select individuals that meet the definition of lay person. The fact that many members appointed by organisations will continue to be registered teachers highlights the importance of ensuring that public interest members are independent of the teaching profession.

Question 7: In terms of models the independent Council could adopt, do you prefer Model 1 or Model 2, a variant of either model, the status quo, or something completely different?



106. The Scottish Government does not believe the best model for a newly independent GTCS is the retention of the status quo. The Scottish Government is in favour of the variant model for Council suggested by some respondents which would contain:
- > a majority of elected teachers;
 - > seats set aside for key educational interests (it is proposed that these organisations will be able to nominate members as per current practice); and
 - > seats set aside for members of the public who could apply via an independent appointments process.
107. This model allows for the retention of the election process which many respondents believed was key to the continuing legitimacy of the Council amongst teachers. It also allows for the retention of seats for key bodies (albeit with a reduction in the overall percentage of seats) which was argued for strongly by many respondents. The introduction of an independent appointments process to fill an increased percentage of public interest seats will help ensure the widest possible range of viewpoints are heard on Council.

Elected teacher majority

108. As discussed, the independent GTCS will retain an elected teacher majority. However, the Scottish Government intend that in amending the 1965 Act, the current list of categories (primary teacher, secondary teacher etc) and the number of seats attributed to each will be removed. There will remain a statutory basis for the teacher majority but it will be the responsibility of the GTCS as an independent regulatory body to consider what each category should be and the number of seats that should be attributed to each. It will be necessary for this work to be considered in partnership with other parties interested in the work of Council.
109. The Scottish Government believe that it is appropriate for the GTCS, as the independent regulatory body for the teaching profession in Scotland, to be able to have the flexibility to work with the profession to decide how its various sectors are represented on Council. Removing the list of categories from legislation will also allow future Councils to more easily consider whether new categories of elected member need to be introduced to Council. Finally, the 1965 Act will be amended so that the election process can be changed by the Council, without requiring new secondary legislation on each occasion.

110. While supporting the continuation of the teacher election process, the Scottish Government notes the continued low turnout in the 2009 elections despite very significant efforts both by the GTCS itself and by the teacher unions. The Scottish Government believes that the GTCS and the teaching community more widely should continue to consider ways in which turnout can be raised in advance of elections to the first fully independent Council.

Organisations with rights to appoint members of Council

111. In a Council of 37, there will be 11 seats set aside for members appointed by key organisations. The Scottish Government accepts that under an independent Council, it would be beneficial for many of the bodies that currently have rights to appoint members to continue to do so as they have an important role to play in the delivery of education in Scotland. However, in reflecting on the reduction in the overall number of seats in Council, and the resultant reduction in places for organisational appointments, the Scottish Government does wish to take the opportunity to amend the list of organisations that can appoint. Specifically we propose to introduce two new over-arching categories covering Local Government/Employers and Universities. The Scottish Government also believes it is appropriate for parents to have a guaranteed place on Council through an appointment made by the National Parents Forum.

112. Local Government/Employers. Currently COSLA, ADES and ADSW all separately appoint members of Council. It is the Scottish Government's view that as these organisations all work in the local authority sector, it should be open for the sector to decide who will be a member of Council as opposed to specifying particular local authority branches. While it seems likely that at least one Director of Education will continue to be appointed to Council, the other seats could be filled by elected Council members or officials with an interest in the work of the GTCS. These individuals would not necessarily have to be drawn from the education services, but as with the ADSW seat in the current Council, could be drawn from the wider range of local authority services. We expect that COSLA, in partnership with ADES and other local authority interests, will lead the appointments process for this category. We would also expect that all those appointed must have the support of their home authority before taking up post.



113. Universities. Currently Universities providing Initial Teacher Education Courses and other Universities appoint members of Council. As with the Local Government/ Employers category, the Scottish Government believes that it would be appropriate to create a single category to cover all University interests and allow the University sector, under the auspices of University Scotland, the freedom to decide who should become a member. As the Universities providing ITE courses have a clear interest in the work of the GTCS, we would expect that at least one of the three seats available will be filled by a representative from an ITE course provider.
114. National Parents Forum. There will be a single seat for a representative of parents that will be nominated by the National Parents Forum. This is a new body designed to give parents a greater voice on a national level on educational issues. The interests of parents are recognised in the current Council through Ministerial Appointments and giving a guaranteed seat to the Forum acknowledges the important role parents have while giving the new Forum an appropriate responsibility. The inclusion of a guaranteed seat for the Forum does not mean that other individuals who are able to represent the interests of parents cannot apply to become Council members through the public appointments route as described in paragraph 102. The seat will simply guarantee a minimum level of representation for a key element of public interest.
115. Other organisations. The other organisations that currently have a right to appoint members, the Churches and Colleges of Further Education will be able to appoint one member each. The list of organisations with the ability to appoint members, along with the number of seats they will be given is listed below. The 1965 Act will be amended to reflect the new arrangements.

Organisations with the right to appoint members to the independent Council

Organisational Appointments – (11 Seats)
Local Government (3)
Colleges of Further Education (1)
Scottish Council of Independent Schools (1)
Universities (3)
Roman Catholic Church (1)
Church of Scotland (1)
National Parents Forum (1)

116. As discussed in the response to question 6, the new Council will also include 7 seats for public interest representatives to be filled through an independent appointments process.
117. The Scottish Government would like to emphasise that the list of organisations with a right to appoint, while highlighting key interests, is not an exhaustive list and any individual organisation, or umbrella body, should be encouraged to contact and work directly with Council members and officials as necessary. Similarly the independent GTCS is encouraged to regularly engage and work in partnership with a wide range of stakeholders and not simply the core set of key interests who have the right to appoint to Council.

Pre-school/non-school teachers

118. The current Council includes an election category for pre-school/non-school teachers. This category was introduced further to the Standards in Scotland's Schools etc Act 2000 that followed the review of the GTCS carried out by Deloitte and Touche in 1999. In the elections that have followed the introduction of the 2000 Act, the GTCS have consistently found it difficult to identify candidates to fill this seat. This has resulted in the GTCS operating for long spells with a reduced complement of Council members. As this category has proved so difficult to fill, it is expected that the independent GTCS will remove it from the list of categories from which teachers can be elected.
119. The single seat designated for this category will be re-absorbed into the total seats available for elected teachers in a new model the independent GTCS will bring forward. The Twelfth Council, starting in November 2009, will therefore be the last Council where this category is represented in the election process.

Question 8: In considering the composition of the current Council, do you think that there are groups missing from whose input the Council would benefit?

120. The Scottish Government notes that a majority of respondents suggested that no additional groups need to feature in the membership of the Council. We also note the wide variety of the other groups suggested by other respondents to the consultation.



121. It is our view that the independent appointments process will act as the mechanism that will allow a wide variety of elements of the public interest to be represented on Council. The process will be developed so that key elements of the public interest such as parents, business and the wider early years interests are represented.

Chapter 4

Question 9: Do you have any comments relating to the issues raised in this section?

122. The Scottish Government wishes to re-state the commitment given in section 3.4 and throughout the consultation paper that the forthcoming legislation amending the 1965 Act will give the independent GTCS more flexibility in the way in which it carries out its functions. This will include an increased level of freedom in the way the organisation can be structured, including the committee structure, and an increased level of freedom in relation to financial matters.
123. It is the intention that as a public body undertaking an important function, it remains appropriate for the GTCS to submit its Annual Report, Strategic Plan and Diversity Action Plan to the Scottish Parliament.

Question 10: Do you believe the length of time individuals should be allowed to serve on Council should be capped?

124. Despite the majority of consultation responses suggesting a cap should not be imposed, the Scottish Government believes that the length of time that individuals can serve as a member of the Council should be capped. Although the majority of Council members will be elected, the Scottish Government believes the cap should apply equally to all members no matter if they are elected, nominated by an organisation or appointed through the independent appointments process.
125. Accordingly, the Scottish Government propose introducing a cap of two terms of four years within a period of twenty years. This will bring the GTCS into a similar position as many other regulatory bodies. This arrangement will strike a balance between allowing existing members to develop experience in working with the GTCS while ensuring that membership of the Council is regularly refreshed and other interested individuals are given the chance to become involved.

126. The Scottish Government notes that some consultation responses suggested there should be a rolling programme of membership so that the Council does not lose a considerable number of experienced members at the same time (e.g. when a term ends). After discussion with the GTCS, it has been decided not to adopt a rolling programme for the replacement of Council members at this juncture as the complexity of running multiple election processes across the life of each Council would be complicated and expensive. However, the Scottish Government will ensure that the 1965 Act is amended so that if a future independent Council wishes to change GTCS policy in relation to the order in which Councils are formed, it will be possible to do so without recourse to further legislative change.

Other comments

127. The Scottish Government wishes to address some of the additional comments made through the consultation.

Registration of other groups

128. The Scottish Government is aware of ongoing discussions relating to whether the GTCS should register other groups of staff involved in the delivery of education. It was felt that it would be more appropriate for discussions around whether additional groups should be registered to take place outwith the consultation on independent status so as to not deflect from the core purpose of this particular piece of work. It is envisaged that an independent GTCS would be able to open new parts of the register as long as the regulation of those groups fitted within the core functions set out in the 1965 Act as amended. If however Council wanted to register groups not directly related to the core functions of GTCS, it would be necessary for the Government to give the Council the legal basis to do so.

Financial Flexibility

129. As stated in the consultation paper it is the Scottish Government's intention that the GTCS is provided more flexibility in the way in which it operates. Accordingly the Council will be provided with the legislative basis to manage its finances as it sees fit.

Management Board

130. The model for Council proposed in this paper does not include the development of a management board that concerned a number of stakeholders. The development of a new committee structure will be a matter for the newly independent GTCS.



4.3 Next Steps

Public Service Reform Bill

131. The draft Public Service Reform (PSR) Bill was introduced to the Scottish Parliament on 28 May 2009. To make the proposed changes to the constitution of the GTCS enshrined in the 1965 Act, it will be necessary to bring forward secondary legislation under section 10 of the draft Bill. The PSR Bill is currently working its way through the Scottish Parliament and if it completes its Parliamentary passage, it is expected to receive Royal Assent towards the middle of 2010. Shortly after this the Scottish Government will introduce the secondary legislation that will underpin the independent GTCS.

GTCS Charity Status

132. The GTCS is currently registered as a charity. However, since 2006 the Office of the Scottish Charities Regulator (OSCR) has considered that the GTCS could have issues in relation to charity law on the basis that a number of sections of the 1965 Act allow the Scottish Ministers to control aspects of the Council's work. As independence from Ministerial control is a key tenet of charity law, OSCR considered that GTCS may not comply with charity law on the basis of some sections of the 1965 Act.
133. To ensure that GTCS continues to be classed as a charity, Scottish Ministers have brought forward legislation under section 102(a) of the Charities and Trustee Investment (Scotland) Act which repeals the sections of the 1965 Act that allow Ministers to control aspects of the GTCS. In practice these amendments to the 1965 Act bring forward some of changes the Scottish Government had originally intended to make through the PSR Bill².

² The Teaching Council (Scotland) Act 1965 Modification Order 2009 repeals sections 4A, 5(1)(b), 6A, paragraph 8(2) of Schedule 1 and paragraph 16A of Schedule 1 of the Teaching Council (Scotland) Act 1965, as amended. A copy is available here from www.opsi.gov.uk

Timetable

134. As discussed above, it will be necessary to bring forward secondary legislation under section 10 of the draft Bill. This legislation will set out a new constitution for the independent GTCS and will provide the legal basis for the changes that have been discussed throughout this paper. The Scottish Government will issue a consultation towards the middle of this year on the draft legislation thereby giving stakeholders the opportunity to comment on the detail of the proposed legislation.
135. It is expected that all the legislative changes to the GTCS will have been made by the end of 2010. Taking into account the expected timetable of the PSR Bill and the necessary subsequent legislation, it is estimated that the current (Twelfth) Council will exist for around 2 years. The Thirteenth Council will therefore be the first to operate under the new legislative framework as set in this paper.



annex a: list of consultees

Association of Directors of Education Scotland
Association of Directors of Social Work Scotland
Commission for Racial Equality
Convention of Scottish Local Authorities
Disability Rights Commission
Equal Opportunities Commission
Faith Groups
General Medical Council
General Teaching Council for Scotland
Her Majesty's Inspector of Education
Learning Teaching Scotland
Local Authority Chief Executives
Local Authority Directors of Education
Office of the Commissioner for Public Appointments Scotland
Parents Groups
Political Parties
Scotland's Commissioner for Children and Young People
Scottish Council for Independent Schools
Scottish Further Education Colleges
Scottish Higher Education Institutes
Scottish Local Authorities
Scottish Youth Parliament
Scottish Qualifications Authority
Teacher Unions and Professional Bodies

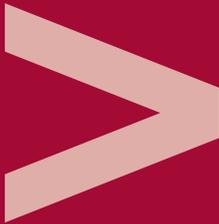
annex b: list of organisations that responded to the consultation³

Aberdeen City Council, Culture and Learning
 Aberdeen College
 Aberdeenshire Council
 Adam Smith College
 Association of Directors of Education in Scotland
 Annesland College
 Argyll and Bute Council
 Association of Chartered Teachers
 Association of Heads and Deputies Scotland
 Association of Teachers and Lecturers
 Catholic Education Commission
 Catholic Headteachers' Association of Scotland
 Central College Glasgow
 Children in Scotland
 Church of Scotland
 Clydebank College
 Consumer Focus Scotland
 Convention of Scottish Local Authorities
 Dumfries and Galloway Council
 Dundee City Council
 East Ayrshire Council
 East Dunbartonshire Council
 East Renfrewshire
 Edinburgh City Council
 Educational Institute of Scotland
 Elmwood College
 Falkirk Council
 Falkirk High School Parent Council
 Fife Council
 General Medical Council
 General Teaching Council for Scotland
 General Teaching Council for Wales
 Glasgow University

³ 156 individuals also responded to the consultation, but their names have not been listed here as per protocol set out in the Scottish Government Respondent Information Form.



Inverclyde Council
James Watt College
John Wheatley College
Learning and Teaching Scotland
Moray Council
NASUWT
National CPD Team
North Ayrshire Council
North Lanarkshire Council
Perth and Kinross Council
Quality Assurance Agency for Higher Education
Renfrewshire Council
School Leaders Scotland
Scotland's Colleges
Scottish Council for Independent Schools
Scottish Disability Equality Forum
Scottish Engineering
Scottish Out of School Care Network
Scottish Parent Teacher Council
Scottish Public Sector Ombudsman
Scottish Teacher Education Committee
Scottish Secondary Teachers Association
South Lanarkshire Council
Stevenson College
Stirling Institute of Education
Stow College
University of Aberdeen
University of Edinburgh
University of Strathclyde
University of the West of Scotland
Voice
West Lothian College
West Lothian Council
West Lothian Local Negotiating Committee for Teachers



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